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Fujian Jinhua Integrated Circuit Co., Ltd.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Case No. 3:17-cv-6932-MMC

MICRON TECHNOLOGY, INC.,

Plaintiff,

v.

UNITED MICROELECTRONICS
CORPORATION, FUJIAN JINHUA
INTEGRATED CIRCUIT CO.,
LTD., and DOES 1-10

Defendants.

**DECLARATION OF FEI HU IN SUPPORT OF
DEFENDANT FUJIAN JINHUA INTEGRATED
CIRCUIT CO., LTD.'S OPPOSITION TO
PLAINTIFF MICRON TECHNOLOGY, INC.'S
MOTION TO LIFT STAY**

Judge: Honorable Maxine M. Chesney
Courtroom: 07, 19th Floor
Hearing Date: 1/8/2020
Hearing Time: 09:00 AM

I, Fei Hu, hereby declare as follows:

1. I am an attorney at the law firm of Brinks Gilson & Lione (“BGL”), and counsel of record for Defendant Fujian Jinhua Integrated Circuit Co., Ltd. (“Jinhua”) in the above-captioned case.

2. I am a member in good standing of The District of Columbia Bar and I am admitted to appear on behalf of Jinhua before this Court *Pro Hac Vice*. I offer this Declaration based on personal knowledge and, if called upon to do so, could testify competently regarding the facts stated herein.

3. During December 9-17, 2020, I searched the Internet and located the following documents:

- a. Ex. FH 1 *U.S. Semiconductor Exports to China: Current Policies and Trends*, CSET Issue Brief, October 2020, available at: <https://cset.georgetown.edu/wp-content/uploads/U.S.-Semiconductor-Exports-to-China-Current-Policies-and-Trends.pdf>, last visited Dec. 17, 2020;
- b. Ex. FH 2 *Taiwan’s UMC freezes ties with Chinese firm in response to US sanctions*, Taiwan News, November 1, 2018, available at: <https://www.taiwannews.com.tw/en/news/3565841>, last visited Dec. 17, 2020;
- c. Ex. FH 4 *Micron bets on Xi’an plant for accolades*, China Daily, Apr. 16, 2020, available at: <https://www.chinadaily.com.cn/a/202004/16/WS5e97bde2a3105d50a3d169b4.html>, last visited Dec. 17, 2020;
- d. Ex. FH 5 *Micron says emerging Chinese rivals pose no threat – for now*, Nikkei Asia, October 7, 2020, available at: <https://asia.nikkei.com/Editor-s-Picks/Interview/Micron-says-emerging-Chinese-rivals-pose-no-threat-for-now>, last visited Dec. 17, 2020;
- e. Ex. FH 11 *Experience is more important than money: Micron does not believe in the imminent success of Chinese memory manufacturers and is not afraid of competition with them*, 4Your Daily, October 2020, available at: <https://4youdaily.com/ram-modules-memory-cards-flash-drives-card-readers/experience-is-more-important-than-money-micron-does-not-believe-in->

the-imminent-success-of-chinese-memory-manufacturers-and-is-not-afraid-of-competition-with-them/, last visited Dec. 17, 2020;

f. Ex. FH 6 *Memory Technology and Overall Trends in the Semiconductor Industry*, Semicon Taiwan, Dr. Handel H. Jones, available at: <https://www.semicon taiwan.org/en/sites/semicon taiwan.org/files/data16/docs/Topic%203-%20Handel%20Jones-0816.pdf>, last visited Dec. 17, 2020;

g. Ex. FH 7 *DRAM, NAND and Emerging Memory Technology Trends and Developments in 2019*, Semiconductor Digest, Sept. 13, 2019, available at: <https://www.semiconductor-digest.com/2019/09/13/dram-nand-and-emerging-memory-technology-trends-and-developments-in-2019/>, last visited Dec. 17, 2020; and

h. Ex. I *Attorney General Jeff Sessions Announces New Initiative to Combat Chinese Economic Espionage*, Department of Justice, November 1, 2018, available at: <https://www.justice.gov/opa/speech/attorney-general-jeff-sessions-announces-new-initiative-combat-chinese-economic-espionage>, last visited Dec. 17, 2020

I declare under penalty of perjury under 28 U.S.C. § 1746 and the laws of the United States that the foregoing is true and correct to the best of my knowledge and belief.

Executed this 18 day of December, 2020 in Shenzhen, China.



FEI HU